

**Executive Summary – Enforcement Matter – Case No. 50177**  
**Pahuja Orange, LLC aka Alloy Polymers Orange, LLC**  
**RN100590207**  
**Docket No. 2015-0338-IWD-E**

**Order Type:**

Findings Agreed Order

**Findings Order Justification:**

Three or more enforcement actions (NOVs, orders, etc.) over the prior five year period for the same violation(s).

**Media:**

IWD

**Small Business:**

Yes

**Location(s) Where Violation(s) Occurred:**

Alloy Polymers, located at 6522 IH-10 West, approximately one mile east of State Highway 62 and west of the City of Orange, Orange County

**Type of Operation:**

Wastewater treatment facility

**Other Significant Matters:**

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

**Texas Register Publication Date:** June 19, 2015

**Comments Received:** No

***Penalty Information***

**Total Penalty Assessed:** \$14,000

**Amount Deferred for Expedited Settlement:** \$0

**Amount Deferred for Financial Inability to Pay:** \$0

**Total Paid to General Revenue:** \$14,000

**Total Due to General Revenue:** \$0

Payment Plan: N/A

**Supplemental Environmental Project ("SEP") Conditional Offset:** \$0

Name of SEP: N/A

**Compliance History Classifications:**

Person/CN - Satisfactory

Site/RN - Satisfactory

**Major Source:** No

**Statutory Limit Adjustment:** N/A

**Applicable Penalty Policy:** April 2014

**Executive Summary – Enforcement Matter – Case No. 50177  
Pahuja Orange, LLC aka Alloy Polymers Orange, LLC  
RN100590207  
Docket No. 2015-0338-IWD-E**

***Investigation Information***

**Complaint Date(s):** N/A  
**Complaint Information:** N/A  
**Date(s) of Investigation:** December 16, 2014  
**Date(s) of NOE(s):** February 13, 2015

***Violation Information***

Failed to comply with permitted effluent limits for zinc, total suspended solids, total organic carbon, and 5-day biochemical oxygen demand [TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), and Texas Pollutant Discharge Elimination System Permit No. WQ0002835000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 002].

***Corrective Actions/Technical Requirements***

**Corrective Action(s) Completed:**

The Respondent has implemented the following corrective actions:

- a. In May 2014, began a weekly backwash program for anthracite and activated carbon filter systems;
- b. In September 2014, performed a color tracer test in lift stations and toilets;
- c. On March 14, 2015, cleaned the sumps by washing and removal of solid materials;
- d. On March 21, 2015, replaced all filter media; and
- e. By January 31, 2015, returned to compliance with permitted effluent limits.

**Technical Requirements:**

N/A

***Litigation Information***

**Date Petition(s) Filed:** N/A  
**Date Answer(s) Filed:** N/A  
**SOAH Referral Date:** N/A  
**Hearing Date(s):** N/A  
**Settlement Date:** N/A

**Executive Summary – Enforcement Matter – Case No. 50177**  
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***Contact Information***

**TCEQ Attorney:** N/A

**TCEQ Enforcement Coordinator:** James Boyle, Enforcement Division,  
Enforcement Team 3, MC 169, (512) 239-3158; Michael Parrish, Enforcement Division,  
MC 219, (512) 239-2548

**TCEQ SEP Coordinator:** N/A

**Respondent:** Danny Posey, Site Manager, Alloy Polymers Orange, 6522 IH-10 West,  
Orange, Texas 77632

**Respondent's Attorney:** N/A





# Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

<b>DATES</b>	<b>Assigned</b>	23-Feb-2015	<b>Screening</b>	25-Feb-2015	<b>EPA Due</b>	
	<b>PCW</b>	21-Apr-2015				

## RESPONDENT/FACILITY INFORMATION

<b>Respondent</b>	Pahuja Orange, LLC aka Alloy Polymers Orange, LLC		
<b>Reg. Ent. Ref. No.</b>	RN100590207		
<b>Facility/Site Region</b>	10-Beaumont	<b>Major/Minor Source</b>	Minor

## CASE INFORMATION

<b>Enf./Case ID No.</b>	50177	<b>No. of Violations</b>	2
<b>Docket No.</b>	2015-0338-IWD-E	<b>Order Type</b>	Findings
<b>Media Program(s)</b>	Water Quality	<b>Government/Non-Profit</b>	No
<b>Multi-Media</b>		<b>Enf. Coordinator</b>	Gregory Zychowski
		<b>EC's Team</b>	Enforcement Team 3
<b>Admin. Penalty \$ Limit Minimum</b>	\$0	<b>Maximum</b>	\$25,000

## Penalty Calculation Section

**TOTAL BASE PENALTY (Sum of violation base penalties)** **Subtotal 1** **\$10,000**

## ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

**Compliance History** **65.0%** Enhancement **Subtotals 2, 3, & 7** **\$6,500**

Notes: Enhancement for two agreed orders with a denial of liability, and five months of self-reported effluent violations.

**Culpability** **No** **0.0%** Enhancement **Subtotal 4** **\$0**

Notes: The Respondent does not meet the culpability criteria.

**Good Faith Effort to Comply Total Adjustments** **Subtotal 5** **-\$2,500**

**Economic Benefit** **0.0%** Enhancement\* **Subtotal 6** **\$0**

Total EB Amounts \$5,855  
Estimated Cost of Compliance \$71,500  
\*Capped at the Total EB \$ Amount

**SUM OF SUBTOTALS 1-7** **Final Subtotal** **\$14,000**

**OTHER FACTORS AS JUSTICE MAY REQUIRE** **0.0%** **Adjustment** **\$0**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

**Final Penalty Amount** **\$14,000**

**STATUTORY LIMIT ADJUSTMENT** **Final Assessed Penalty** **\$14,000**

**DEFERRAL** **0.0%** Reduction **Adjustment** **\$0**

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes:

No deferral is recommended for Findings Orders.

**PAYABLE PENALTY** **\$14,000**

Screening Date 25-Feb-2015

Docket No. 2015-0338-IWD-E

PCW

Respondent Pahuja Orange, LLC aka Alloy Polymers Orange, LLC

Policy Revision 4 (April 2014)

Case ID No. 50177

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100590207

Media [Statute] Water Quality

Enf. Coordinator Gregory Zychowski

## Compliance History Worksheet

## &gt;&gt; Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action ( <i>number of NOVs meeting criteria</i> )	5	25%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	2	40%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%
Emissions	Chronic excessive emissions events ( <i>number of events</i> )	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which notices were submitted</i> )	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	0	0%
Please Enter Yes or No			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 65%

## &gt;&gt; Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

## &gt;&gt; Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

## &gt;&gt; Compliance History Summary

Compliance  
History  
Notes

Enhancement for two agreed orders with a denial of liability, and five months of self-reported effluent violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, &amp; 7) 65%

## &gt;&gt; Final Compliance History Adjustment

Final Adjustment Percentage \*capped at 100% 65%

Screening Date 25-Feb-2015

Docket No. 2015-0338-IWD-E

PCW

Respondent Pahuja Orange, LLC aka Alloy Polymers Orange, LLC

Policy Revision 4 (April 2014)

Case ID No. 50177

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100590207

Media [Statute] Water Quality

Enf. Coordinator Gregory Zychowski

Violation Number 1

Rule Cite(s)

Tex. Water Code § 26.121(a)(1), 30 Tex. Admin. Code § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0002835000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 002.

Violation Description

Failed to comply with permitted effluent limits, as documented during a record review conducted on December 16, 2014, and shown in the attached violation table.

Base Penalty \$25,000

## &gt;&gt; Environmental, Property and Human Health Matrix

OR

	Major	Moderate	Minor
Release			
Actual		x	
Potential			

Percent 15.0%

## &gt;&gt; Programmatic Matrix

	Major	Moderate	Minor
Falsification			

Percent 0.0%

Matrix Notes

Human health or the environment has been exposed to significant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

## Violation Events

Number of Violation Events 2

61

Number of violation days

mark only one  
with an x

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$7,500

Two monthly events are recommended for the months of June and July 2014.

## Good Faith Efforts to Comply

25.0%

Reduction \$1,875

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary		
Ordinary	x	
N/A		(mark with x)

Notes

The Respondent achieved compliance by January 31, 2015.

Violation Subtotal \$5,625

## Economic Benefit (EB) for this violation

## Statutory Limit Test

Estimated EB Amount \$0

Violation Final Penalty Total \$10,500

This violation Final Assessed Penalty (adjusted for limits) \$10,500

# Economic Benefit Worksheet

**Respondent** Pahuja Orange, LLC aka Alloy Polymers Orange, LLC  
**Case ID No.** 50177  
**Reg. Ent. Reference No.** RN100590207  
**Media** Water Quality  
**Violation No.** 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

## Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit Worksheet for Violation No. 2.

## Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$0

TOTAL \$0



Screening Date 25-Feb-2015

Docket No. 2015-0338-IWD-E

PCW

Respondent Pahuja Orange, LLC aka Alloy Polymers Orange, LLC

Policy Revision 4 (April 2014)

Case ID No. 50177

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100590207

Media [Statute] Water Quality

Enf. Coordinator Gregory Zychowski

Violation Number 2

Rule Cite(s) Tex. Water Code § 26.121(a)(1), 30 Tex. Admin. Code § 305.125(1), and TPDES Permit No. WQ0002835000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 002.

Violation Description Failed to comply with permitted effluent limits, as documented during a record review conducted on December 16, 2014, and shown in the attached violation table.

Base Penalty \$25,000

## &gt;&gt; Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			X
Potential			

Percent 5.0%

## &gt;&gt; Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Simplified models were used to evaluate BOD5 and Zinc to determine whether the discharged amounts of pollutants exceeded levels that are protective of human health or the environment. Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$23,750

\$1,250

## Violation Events

Number of Violation Events 2

61 Number of violation days

mark only one with an x

daily	
weekly	
monthly	
quarterly	X
semiannual	
annual	
single event	

Violation Base Penalty \$2,500

Two quarterly events are recommended for the quarters containing the months of November 2013 and May 2014.

## Good Faith Efforts to Comply

25.0%

Reduction \$625

Before NOE/NOV NOE/NOV to EDRP/Settlement Offer

Extraordinary		
Ordinary	X	
N/A		(mark with x)

Notes

The Respondent achieved compliance by January 31, 2015.

Violation Subtotal \$1,875

## Economic Benefit (EB) for this violation

## Statutory Limit Test

Estimated EB Amount \$5,855

Violation Final Penalty Total \$3,500

This violation Final Assessed Penalty (adjusted for limits) \$3,500

# Economic Benefit Worksheet

**Respondent** Pahuja Orange, LLC aka Alloy Polymers Orange, LLC  
**Case ID No.** 50177  
**Reg. Ent. Reference No.** RN100590207  
**Media** Water Quality  
**Violation No.** 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Overtime Costs	EB Amount
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No commas or \$

## Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction	\$71,500	30-Nov-2013	31-Jan-2015	1.17	\$279	\$5,576	\$5,855
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

### Notes for DELAYED costs

Estimated cost to begin a weekly backwash program for anthracite and activated carbon filter systems; perform a color tracer test in lift stations and toilets; clean the sumps by washing and removal of solid materials; replace all filter media; and return to compliance with permitted effluent limits. Date Required is the initial date of noncompliance. Final Date is the date of compliance.

## Avoided Costs

### ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

### Notes for AVOIDED costs

Approx. Cost of Compliance

\$71,500

TOTAL

\$5,855

**Pahuja Orange, LLC aka Alloy Polymers Orange, LLC**  
**Docket No. 2015-0338-IWD-E**  
**TPDES Permit No. WQ0002835000**

**Effluent Parameter Violation Table**  
**Outfall 002**

	<b>BOD5</b>	<b>Total Organic Carbon</b>	<b>Total Suspended Solids</b>	<b>Zinc</b>	
	Daily Max. Concentration	Daily Max. Concentration	Daily Max. Concentration	Daily Average Concentration	Daily Max. Concentration
<b>Month/Year</b>	Limit = 26 mg/L	Limit = 75 mg/L	Limit = 19 mg/L	Limit = 0.075 mg/L	Limit = 0.16 mg/L
November 2013	52	c	c	c	c
May 2014	c	c	c	0.091	0.231
June 2014	113	98.4	c	c	c
July 2014	400	104	38	c	c

BOD5 = five-day Biochemical Oxygen Demand      c = compliant      Max. = Maximum  
mg/L = milligrams per liter



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## TCEQ Compliance History Report

**PUBLISHED** Compliance History Report for CN603334343, RN100590207, Rating Year 2014 which includes Compliance History (CH) components from September 1, 2009, through August 31, 2014.

**Customer, Respondent, or Owner/Operator:** CN603334343, Pahuja Orange, LLC  
**Classification:** SATISFACTORY **Rating:** 15.61  
**Regulated Entity:** RN100590207, Alloy Polymers  
**Classification:** SATISFACTORY **Rating:** 15.61  
**Complexity Points:** 12  
**Repeat Violator:** NO  
**CH Group:** 14 - Other  
**Location:** located at 6522 Interstate Highway 10 West, approximately one mile east of State Highway 62 and west of the City of Orange, Orange County, Texas  
**TCEQ Region:** REGION 10 - BEAUMONT

**ID Number(s):**

**AIR NEW SOURCE PERMITS** REGISTRATION 14104  
**AIR NEW SOURCE PERMITS** REGISTRATION 23030  
**AIR NEW SOURCE PERMITS** AFS NUM 4836100044

**AIR NEW SOURCE PERMITS** REGISTRATION 14840  
**AIR NEW SOURCE PERMITS** ACCOUNT NUMBER OC0056T  
**PUBLIC WATER SYSTEM/SUPPLY** REGISTRATION 1810187  
**WASTEWATER** EPA ID TX0104710

**WASTEWATER** PERMIT WQ0002835000

**AIR EMISSIONS INVENTORY** ACCOUNT NUMBER OC0056T

**Compliance History Period:** September 01, 2009 to August 31, 2014 **Rating Year:** 2014 **Rating Date:** 09/01/2014  
**Date Compliance History Report Prepared:** March 23, 2015  
**Agency Decision Requiring Compliance History:** Enforcement  
**Component Period Selected:** March 23, 2010 to March 23, 2015

**TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.**

**Name:** Greg Zychowski

**Phone:** (512) 239-3158

**Site and Owner/Operator History:**

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO
- 3) If **YES** for #2, who is the current owner/operator? N/A
- 4) If **YES** for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If **YES**, when did the change(s) in owner or operator occur? N/A

## **Components (Multimedia) for the Site Are Listed in Sections A - J**

### **A. Final Orders, court judgments, and consent decrees:**

- 1 Effective Date: 05/08/2011 ADMINORDER 2010-1645-IWD-E (1660 Order-Agreed Order With Denial)  
Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
Rqmt Prov: Effluent Limits PERMIT  
Description: Failure to comply with permit effluent limits for total zinc, total suspended solids, and 5-day biochemical oxygen demand..
- 2 Effective Date: 12/19/2013 ADMINORDER 2013-0353-IHW-E (1660 Order-Agreed Order With Denial)  
Classification: Moderate  
Citation: 30 TAC Chapter 335, SubChapter C 335.62  
30 TAC Chapter 335, SubChapter R 335.503  
30 TAC Chapter 335, SubChapter R 335.504  
40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11  
Description: Failure to conduct hazardous waste determinations and classification on industrial solid waste streams.  
Classification: Moderate  
Citation: 30 TAC Chapter 335, SubChapter A 335.9(a)(1)  
30 TAC Chapter 335, SubChapter R 335.513(a)  
Description: Failure to maintain records of all hazardous and industrial solid waste activities regarding the quantities generated, stored, processed, and disposed of on-site or shipped off-site for storage, processing, or disposal.  
Classification: Moderate  
Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)  
Description: Failure to maintain the Notice of Registration current with information regarding waste streams and waste management units for industrial solid waste.  
Classification: Moderate  
Citation: 30 TAC Chapter 335, SubChapter A 335.1(138)(I)  
40 CFR Chapter 261, SubChapter I, PT 261, SubPT A 261.2(f)  
Description: Failure to maintain records to support a claim that a material is not a solid waste per 30 TAC 335.1(138)(F)(ii).

### **B. Criminal convictions:**

N/A

### **C. Chronic excessive emissions events:**

N/A

### **D. The approval dates of investigations (CCEDS Inv. Track. No.):**

Item 1	March 31, 2010	(797000)	Item 16	June 19, 2013	(1111876)
Item 2	October 20, 2011	(972868)	Item 17	July 19, 2013	(1118777)
Item 3	November 18, 2011	(979005)	Item 18	August 15, 2013	(1126559)
Item 4	February 17, 2012	(999507)	Item 19	September 19, 2013	(1131108)
Item 5	April 11, 2012	(1011605)	Item 20	November 15, 2013	(1142277)
Item 6	May 18, 2012	(1017982)	Item 21	January 16, 2014	(1154795)
Item 7	June 19, 2012	(1025728)	Item 22	February 18, 2014	(1162105)
Item 8	July 19, 2012	(1033077)	Item 23	March 13, 2014	(1168724)
Item 9	September 14, 2012	(1048509)	Item 24	April 18, 2014	(1175899)
Item 10	October 18, 2012	(1068704)	Item 25	May 15, 2014	(1182124)
Item 11	November 15, 2012	(1068705)	Item 26	September 19, 2014	(1207350)
Item 12	December 13, 2012	(1068706)	Item 27	October 20, 2014	(1213753)
Item 13	February 19, 2013	(1082300)	Item 28	November 18, 2014	(1220005)
Item 14	March 18, 2013	(1090927)			
Item 15	May 16, 2013	(1108289)			

**E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):**

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1	Date: 05/31/2014 (1189018)	CN603334343	
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
2	Date: 06/30/2014 (1200880)	CN603334343	
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
3	Date: 07/31/2014 (1200881)	CN603334343	
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
4	Date: 11/30/2014 (1225816)	CN603334343	
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
5	Date: 12/31/2014 (1232811)	CN603334343	
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		

**F. Environmental audits:****G. Type of environmental management systems (EMSs):**

N/A

**H. Voluntary on-site compliance assessment dates:**

N/A

**I. Participation in a voluntary pollution reduction program:**

N/A

**J. Early compliance:**

N/A

**Sites Outside of Texas:**

N/A

## Appendix A

### All NOV's Issued During Component Period 3/23/2010 and 3/23/2015

### All NOV's Issued During Component Period 3/23/2010 and 3/23/2015

Page 4



Classification: Moderate

Self Report? YES

For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

10 Date: 12/17/2010 (879563)

CN603334343

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: FEL&MR PERMIT

Description: Failure by Alloy Polymer-Orange to comply with effluent limitations: fecal coliform count exceeded.

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 335, SubChapter A 335.4(1)

Description: Failure by Alloy Polymer-Orange to prevent unauthorized discharges into or

adjacent to the waters of the state.

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: M&RR 7 PERMIT

Description: Failure by Alloy Polymer-Orange to notify the TCEQ of the occurrence of unauthorized discharges.

11 Date: 12/31/2010 (903694)

CN603334343

Classification: Moderate

Self Report? YES

For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

12 Date: 01/31/2011 (910594)

CN603334343

Classification: Moderate

Self Report? YES

For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

13 Date: 02/28/2011 (917854)

CN603334343

Classification: Moderate

Self Report? YES

For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

14 Date: 03/31/2011 (929557)

CN603334343

Classification: Moderate

Self Report? YES

For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

15 Date: 04/30/2011 (939551)

CN603334343

Classification: Moderate

Self Report? YES

For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

16 Date: 05/31/2011 (946962)

CN603334343

Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

17 Date: 06/30/2011 (954223) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

18 Date: 07/31/2011 (960802) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

19 Date: 08/31/2011 (966884) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

20 Date: 11/30/2011 (985841) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

21 Date: 12/31/2011 (992193) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

22 Date: 02/29/2012 (1005047) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

23 Date: 07/31/2012 (1068703) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

24 Date: 12/31/2012 (1082301) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter



Classification: Minor

Self Report? NO For Informational Purposes Only  
Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(K)  
Description: Failure by Alloy Polymers to have a well vent on the well.

Classification: Minor

Self Report? NO For Informational Purposes Only  
Citation: 30 TAC Chapter 290, SubChapter D 290.42(e)(2)  
Description: Failure by Alloy Polymers to inject the disinfection prior to storage.

Classification: Minor

Self Report? NO For Informational Purposes Only  
Citation: 30 TAC Chapter 290, SubChapter D 290.46(m)  
Description: Failure by Alloy Polymers to maintain the service pump.

30\* Date: 01/06/2014 (1139010) CN603334343  
Classification: Moderate

Self Report? NO For Informational Purposes Only  
Citation: OpR 11(a) PERMIT  
Description: Failure by Alloy Polymers Orange LLC to properly manage wastes in accordance with 30 TAC Chapter 335 relating to Industrial Solid Waste Management.

Classification: Moderate

Self Report? NO For Informational Purposes Only  
Citation: PC 2(g) PERMIT  
Description: Failure by Alloy Polymers Orange LLC to prevent the discharge of wastewater or any other waste into or adjacent to water in the state any location not permitted as an outfall.

Classification: Moderate

Self Report? NO For Informational Purposes Only  
Citation: OpR 11(a) PERMIT  
Description: Failure by Alloy Polymers Orange LLC to manage waste in accordance with all applicable provisions in 30 TAC Chapter 335 relating to Industrial Solid Waste Management.

Classification: Moderate

Self Report? NO For Informational Purposes Only  
Citation: ELMR 1 PERMIT  
Description: Failure by Alloy Polymers Orange LLC to comply with effluent limitations for total zinc for Outfall 002.

31\* Date: 05/31/2014 (1189018) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only  
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)  
Description: Failure to meet the limit for one or more permit parameter

32\* Date: 06/30/2014 (1200880) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only  
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)  
Description: Failure to meet the limit for one or more permit parameter

33\* Date: 07/31/2014 (1200881) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only  
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)  
Description: Failure to meet the limit for one or more permit parameter

34 Date: 11/30/2014 (1225816) CN603334343  
Classification: Moderate

Self Report? YES For Informational Purposes Only

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
 30 TAC Chapter 305, SubChapter F 305.125(1)  
 Description: Failure to meet the limit for one or more permit parameter

35 Date: 12/31/2014 (1232811) CN603334343  
 Classification: Moderate

Self Report? YES For Informational Purposes Only  
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
 30 TAC Chapter 305, SubChapter F 305.125(1)  
 Description: Failure to meet the limit for one or more permit parameter

\* NOV's applicable for the Compliance History rating period 9/1/2009 to 8/31/2014

## Appendix B

### All Investigations Conducted During Component Period March 23, 2010 and March 23, 2015

		(797000)	
Item 1*	March 31, 2010**	For Informational Purposes Only	
		(835265)	
Item 2	April 16, 2010**	For Informational Purposes Only	
		(835266)	
Item 3	May 20, 2010**	For Informational Purposes Only	
		(847613)	
Item 4	June 18, 2010**	For Informational Purposes Only	
		(862015)	
Item 5	July 15, 2010**	For Informational Purposes Only	
		(868589)	
Item 6	August 17, 2010**	For Informational Purposes Only	
		(875483)	
Item 7	September 20, 2010**	For Informational Purposes Only	
		(850270)	
Item 8	October 01, 2010**	For Informational Purposes Only	
		(883022)	
Item 9	November 05, 2010**	For Informational Purposes Only	
		(889442)	
Item 10	November 19, 2010**	For Informational Purposes Only	
		(879563)	
Item 11	December 16, 2010**	For Informational Purposes Only	
		(897805)	
Item 12	December 20, 2010**	For Informational Purposes Only	
		(903694)	
Item 13	January 19, 2011**	For Informational Purposes Only	
		(910594)	
Item 14	February 21, 2011**	For Informational Purposes Only	
		(900498)	
Item 15	March 16, 2011**	For Informational Purposes Only	
		(917854)	
Item 16	March 18, 2011**	For Informational Purposes Only	

Item 17	April 20, 2011**	(929557) For Informational Purposes Only
Item 18	May 20, 2011**	(939551) For Informational Purposes Only
Item 19	June 20, 2011**	(946962) For Informational Purposes Only
Item 20	July 20, 2011**	(954223) For Informational Purposes Only
Item 21	August 19, 2011**	(960802) For Informational Purposes Only
Item 22	September 20, 2011**	(966884) For Informational Purposes Only
Item 23*	October 20, 2011**	(972868) For Informational Purposes Only
Item 24*	November 18, 2011**	(979005) For Informational Purposes Only
Item 25	December 20, 2011**	(985841) For Informational Purposes Only
Item 26	January 20, 2012**	(992193) For Informational Purposes Only
Item 27*	February 17, 2012**	(999507) For Informational Purposes Only
Item 28	March 20, 2012**	(1005047) For Informational Purposes Only
Item 29*	April 11, 2012**	(1011605) For Informational Purposes Only
Item 30*	May 18, 2012**	(1017982) For Informational Purposes Only
Item 31*	June 19, 2012**	(1025728) For Informational Purposes Only
Item 32*	July 19, 2012**	(1033077) For Informational Purposes Only
Item 33	August 03, 2012**	(1014674) For Informational Purposes Only
Item 34	August 19, 2012**	(1068703) For Informational Purposes Only
Item 35*	September 14, 2012**	(1048509) For Informational Purposes Only
Item 36*	October 18, 2012**	(1068704) For Informational Purposes Only
Item 37*	November 15, 2012**	(1068705) For Informational Purposes Only

Item 38*	December 13, 2012**	(1068706) For Informational Purposes Only
Item 39	January 18, 2013**	(1082301) For Informational Purposes Only
Item 40	January 23, 2013**	(1050787) For Informational Purposes Only
Item 41	February 04, 2013**	(1051645) For Informational Purposes Only
Item 42*	February 19, 2013**	(1082300) For Informational Purposes Only
Item 43*	March 18, 2013**	(1090927) For Informational Purposes Only
Item 44	April 18, 2013**	(1097265) For Informational Purposes Only
Item 45	May 10, 2013**	(1088017) For Informational Purposes Only
Item 46*	May 16, 2013**	(1108289) For Informational Purposes Only
Item 47*	June 19, 2013**	(1111876) For Informational Purposes Only
Item 48*	July 19, 2013**	(1118777) For Informational Purposes Only
Item 49*	August 15, 2013**	(1126559) For Informational Purposes Only
Item 50*	September 19, 2013**	(1131108) For Informational Purposes Only
Item 51	October 17, 2013**	(1136863) For Informational Purposes Only
Item 52*	November 15, 2013**	(1142277) For Informational Purposes Only
Item 53	December 04, 2013**	(1116874) For Informational Purposes Only
Item 54	December 17, 2013**	(1148715) For Informational Purposes Only
Item 55*	January 16, 2014**	(1154795) For Informational Purposes Only
Item 56*	February 18, 2014**	(1162105) For Informational Purposes Only
Item 57*	March 13, 2014**	(1168724) For Informational Purposes Only
Item 58*	April 18, 2014**	(1175899) For Informational Purposes Only

Item 59	May 06, 2014**	(1158653) For Informational Purposes Only
Item 60*	May 15, 2014**	(1182124) For Informational Purposes Only
Item 61	June 20, 2014**	(1189018) For Informational Purposes Only
Item 62	July 18, 2014**	(1200880) For Informational Purposes Only
Item 63	August 19, 2014**	(1200881) For Informational Purposes Only
Item 64*	September 19, 2014	(1207350) For Informational Purposes Only
Item 65*	October 20, 2014	(1213753) For Informational Purposes Only
Item 66*	November 18, 2014	(1220005) For Informational Purposes Only
Item 67	December 19, 2014	(1225816) For Informational Purposes Only
Item 68	January 20, 2015	(1232811) For Informational Purposes Only
Item 69	February 16, 2015	(1215687) For Informational Purposes Only

\* No violations documented during this investigation

\*\*Investigation applicable for the Compliance History Rating period between 09/01/2009 and 08/31/2014.



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	
PAHUJA ORANGE, LLC AKA	§	TEXAS COMMISSION ON
ALLOY POLYMERS ORANGE, LLC	§	
RN100590207	§	ENVIRONMENTAL QUALITY

## AGREED ORDER DOCKET NO. 2015-0338-IWD-E

At its \_\_\_\_\_ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Pahuja Orange, LLC aka Alloy Polymers Orange, LLC ("Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this agreement to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including, but not limited to, the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Agreed Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated settlement of the parties. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Agreed Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

### I. FINDINGS OF FACT

1. The Respondent owns and operates a wastewater treatment facility located at 6522 Interstate Highway 10 West, approximately one mile east of State Highway 62 and west of the City of Orange, in Orange County, Texas (the "Facility").
2. The Respondent has discharged industrial waste into or adjacent to any water in the state under TEX. WATER CODE ch. 26.
3. During a record review conducted on December 16, 2014, TCEQ staff documented the following monthly effluent violations:

Effluent Parameter Violation Table					
Outfall No. 002					
	BOD5	Total Organic Carbon	Total Suspended Solids	Zinc	
	Daily Max. Concentration	Daily Max. Concentration	Daily Max. Concentration	Daily Average Concentration	Daily Max. Concentration
Month/Year	Limit = 26 mg/L	Limit = 75 mg/L	Limit = 19 mg/L	Limit = 0.075 mg/L	Limit = 0.16 mg/L
November 2013	52	c	c	c	c
May 2014	c	c	c	0.091	0.231
June 2014	113	98.4	c	c	c
July 2014	400	104	38	c	c

BOD5 = five-day Biochemical Oxygen Demand      c = compliant      Max. = Maximum  
mg/L = milligrams per liter

4. The Respondent received notice of the violations on or about February 18, 2015.
5. The Executive Director recognizes that the Respondent has implemented the following corrective actions at the Facility:
  - a. In May 2014, began a weekly backwash program for anthracite and activated carbon filter systems;
  - b. In September 2014, performed a color tracer test in lift stations and toilets;
  - c. On March 14, 2015, cleaned the sumps by washing and removal of solid materials;
  - d. On March 21, 2015, replaced all filter media; and
  - e. By January 31, 2015, returned to compliance with permitted effluent limits.

## II. CONCLUSIONS OF LAW

1. The Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE chs. 7 and 26 and the rules of the Commission.
2. As evidenced by Findings of Fact No. 3, the Respondent failed to comply with permitted effluent limits, in violation of TEX. WATER CODE § 26.121(a)(1), 30 TEX. ADMIN. CODE § 305.125(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0002835000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 002, as documented during a record review conducted on December 16, 2014.
3. Pursuant to TEX. WATER CODE § 7.051, the Commission has the authority to assess an administrative penalty against the Respondent for violations of the Texas Water Code and the Texas Health and Safety Code within the Commission's jurisdiction; for violations of rules adopted under such statutes; or for violations of orders or permits issued under such statutes.
4. An administrative penalty in the amount of Fourteen Thousand Dollars (\$14,000) is justified by the facts recited in this Agreed Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Respondent has paid the Fourteen Thousand Dollar (\$14,000) administrative penalty.

## III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed an administrative penalty in the amount of Fourteen Thousand Dollars (\$14,000) as set forth in Section II, Paragraph 4 above, for violations of TCEQ rules and state statutes. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order completely resolve the violations set forth by this Agreed Order in this action. However, the Commission shall not be constrained in any manner from requiring corrective actions or penalties for other violations that are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Pahuja Orange, LLC aka Alloy Polymers Orange, LLC, Docket No. 2015-0338-IWD-E" to:

Financial Administration Division, Revenue Operations Section  
Attention: Cashier's Office, MC 214  
Texas Commission on Environmental Quality  
P.O. Box 13088  
Austin, Texas 78711-3088

2. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.

3. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to the Respondent if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
4. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
5. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
6. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
7. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

## SIGNATURE PAGE

### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date



9/2/16

For the Executive Director

Date

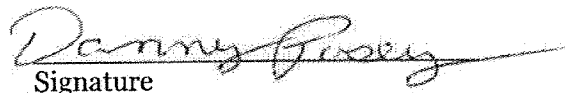
I, the undersigned, have read and understand the attached Agreed Order in the matter of Pahuja Orange, LLC aka Alloy Polymers Orange, LLC. I am authorized to agree to the attached Agreed Order on behalf of Pahuja Orange, LLC aka Alloy Polymers Orange, LLC, and do agree to the specified terms and conditions. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I understand that by entering into this Agreed Order, Pahuja Orange, LLC aka Alloy Polymers Orange, LLC waives certain procedural rights, including, but not limited to, the right to formal notice of violations addressed by this Agreed Order, notice of an evidentiary hearing, the right to an evidentiary hearing, and the right to appeal. I agree to the terms of the Agreed Order in lieu of an evidentiary hearing. This Agreed Order constitutes full and final adjudication by the Commission of the violations set forth in this Agreed Order.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions;
- and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.



Signature

12-29-2015

Date

DANNY POSEY

Name (Printed or typed)

Title Title

Authorized Representative of

Pahuja Orange, LLC aka Alloy Polymers Orange, LLC

Site MGR.